

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) for Authority to Institute a Rate Stabilization Plan with a Rate Increase and End of Rate Freeze Tariffs.	Application 00-11-038 (Filed November 16, 2000)
Emergency Application of Pacific Gas and Electric Company to Adopt a Rate Stabilization Plan. (U 39 E)	Application 00-11-056 (Filed November 22, 2000)
Petition of THE UTILITY REFORM NETWORK for Modification of Resolution E-3527.	Application 00-10-028 (Filed October 17, 2000)

**ASSIGNED COMMISSIONERS' RULING
ADMITTING LATE COMPARISON EXHIBIT
AND REQUESTING COMMENTS**

One draft decision and three alternate decisions are currently before the Commission in this proceeding. The various decisions differ in the methodology they adopt for the permanent allocation of the annual power charge revenue requirement of the Department of Water Resources (DWR). In order to further inform their decision-making process regarding the various decisions, one or more Commissioners has requested information relating to the future impacts on customer bills of the methodologies presented in the decisions.

Accordingly, Energy Division staff has worked with the three utilities to develop a comparison exhibit showing bill impacts. That comparison exhibit is identified as Exhibit 04-COMP BILL, and is attached to this ruling. In order to

provide parties an opportunity to comment on the attached exhibit and give the Commissioners sufficient time to consider the comments, the Assigned Commissioners intend to ask their colleagues to hold the matter until the December 2, 2004 meeting.

Parties wishing to comment on the comparison exhibit must file their comments by Wednesday, November 24, 2004. Comments are to be served electronically no later than 3 pm (and filed by close of business) on that day, and should address the following questions:

1. Are the estimates of bills contained in the exhibit reasonable for the purpose of illustrating the impacts of the various DWR revenue requirement allocation methodologies currently before the Commission?
2. What weight should the Commission give to this exhibit?

Parties may also address other issues relating to the comparison exhibit.

Given the collaborative development of the comparison exhibit, the nature of the exhibit itself, and the limited number and sophistication of the active parties in this phase of this proceeding, evidentiary hearings do not appear to be necessary. If any party believes that an evidentiary hearing is required on the comparison exhibit it must, in its comments:

1. Request an evidentiary hearing;
2. Identify the material disputed issues of fact that require an evidentiary hearing;
3. Identify the nature of the testimony it would introduce at an evidentiary hearing; and
4. Explain why a hearing is required, with citation to any relevant legal authority.

Any possible right to an evidentiary hearing is waived if not requested in comments including the above-required information.

Any and all assumptions or estimates concerning future rates contained or reflected in the comparison exhibit are to be used only for the purpose of helping Commissioners to understand the impact of the proposals before them, and do not prejudice the outcome in any other (pending or future) matters before the Commission. With that limitation, Exhibit 04-COMP BILL is admitted to the record of this proceeding. Any objection to the admission of the comparison exhibit must be raised in comments, or will be considered waived.

IT IS RULED that:

1. The bill comparison exhibit attached to this ruling is marked as Exhibit 04-COMP BILL, and is admitted to the evidentiary record of this proceeding, with the limitation described above.
2. Comments on the comparison exhibit are to be filed and served on November 24, 2004. Service is to be electronic, consistent with prior rulings in this proceeding, and is to be made no later than 3 pm. Filing is to be done by close of business.
3. The contents of the comments are described above.
4. Any objection to the admission of Exhibit 04-COMP BILL, or any request for evidentiary hearings, must be included in comments or be considered waived, as specified above.

Dated November 18, 2004, at San Francisco, California.

/s/ LORETTA LYNCH
Loretta Lynch
Commissioner

/s/ GEOFFREY BROWN
Geoffrey Brown
Commissioner

State of California

Memorandum



Date: November 18, 2004

To: Parties in A.00-11-038

From: **Public Utilities Commission—
Energy Division**

Subject: *A.00-11-038 Bill Impact Comparison Exhibit 04-COMP BILL*

The attached document provides Exhibit 04-COMP BILL, which was developed by PG&E, SCE and SDG&E in response to a request by Commissioners for information relating to the future impacts on customer bills as a result of the DWR allocation methodologies presented in the draft decision and three alternate decisions that are currently before the Commission in this proceeding.

Workpapers supporting these calculations may be obtained from the contacts provided below:

	Contact	Phone	e-mail
PG&E	Craig Buchsbaum	(415) 973-4844	cmb3@pge.com
SCE	J.P. Shotwell	(626) 302-4531	J.P.Shotwell@sce.com
SDG&E	Meredith Allen	(619) 699-5050	meallen@sempra.com

Energy Division Contact:

Steve Roscow
415-703-1189
scr@cpuc.ca.gov

Application No.: A.00-11-038

Exhibit No.: 04-COMP BILL

Date: November 18, 2004

DWR PERMANENT COST ALLOCATION

**BILL IMPACT
COMPARISON EXHIBIT**

PG&E Estimated Bill Impacts Under Various DWR Allocation Scenarios
Total Annual Bill Estimates for Generic Customer Types

Line	Case and Customer Type	Annual Use	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Subtotal 2005-2012 [no 2013]
1	Interim Methodology																
2	Low Usage Residential	6,000	\$656	\$716	\$752	\$712	\$711	\$712	\$712	\$712	\$712	\$712	\$712	\$712	\$711	\$711	\$5,696
3	Moderate Usage Residential	12,000	\$1,375	\$1,495	\$2,009	\$1,918	\$1,793	\$1,930	\$1,982	\$1,966	\$1,950	\$1,943	\$1,959	\$1,939	\$1,839	\$1,850	\$15,508
4	High Usage Residential	18,000	\$2,095	\$2,275	\$3,474	\$3,352	\$2,977	\$3,297	\$3,418	\$3,380	\$3,342	\$3,325	\$3,363	\$3,316	\$3,084	\$3,109	\$26,526
5	Restaurant / Grocery Store	481,800	\$44,232	\$49,050	\$68,442	\$68,442	\$62,030	\$63,099	\$64,519	\$64,080	\$63,635	\$63,437	\$63,881	\$63,327	\$60,609	\$60,896	\$506,588
6	Elementary School	96,540	\$10,592	\$11,556	\$15,641	\$15,641	\$14,399	\$14,807	\$15,133	\$15,032	\$14,930	\$14,885	\$14,987	\$14,859	\$14,235	\$14,301	\$118,868
7	High School	466,032	\$49,304	\$53,964	\$73,723	\$73,723	\$67,694	\$69,944	\$71,557	\$71,059	\$70,553	\$70,329	\$70,833	\$70,203	\$67,116	\$67,442	\$561,594
8	Industrial Customer	24,090,000	\$1,778,510	\$2,019,410	\$3,008,401	\$3,008,401	\$2,684,415	\$2,727,202	\$2,796,619	\$2,775,174	\$2,753,408	\$2,743,754	\$2,765,450	\$2,738,357	\$2,605,504	\$2,619,526	\$21,905,468
9																	
10	Peevey Alternate																
11	Low Usage Residential	6,000	\$656	\$716	\$752	\$712	\$711	\$712	\$712	\$712	\$712	\$712	\$713	\$713	\$711	\$711	\$5,696
12	Moderate Usage Residential	12,000	\$1,375	\$1,495	\$2,009	\$1,918	\$1,793	\$1,891	\$1,951	\$1,938	\$1,914	\$1,909	\$2,059	\$2,012	\$1,836	\$1,851	\$15,511
13	High Usage Residential	18,000	\$2,095	\$2,275	\$3,474	\$3,352	\$2,977	\$3,206	\$3,345	\$3,314	\$3,258	\$3,248	\$3,597	\$3,488	\$3,077	\$3,112	\$26,532
14	Grocery or Restaurant	481,800	\$44,232	\$49,050	\$68,442	\$68,442	\$62,030	\$62,038	\$63,667	\$63,300	\$62,642	\$62,530	\$66,620	\$65,341	\$60,524	\$60,934	\$506,662
15	Elementary School	96,540	\$10,592	\$11,556	\$15,641	\$15,641	\$14,399	\$14,563	\$14,937	\$14,853	\$14,702	\$14,676	\$15,616	\$15,322	\$14,215	\$14,309	\$118,885
16	High School	466,032	\$49,304	\$53,964	\$73,723	\$73,723	\$67,694	\$68,739	\$70,589	\$70,173	\$69,425	\$69,298	\$73,944	\$72,491	\$67,018	\$67,485	\$561,678
17	Industrial Customer	24,090,000	\$1,778,510	\$2,019,410	\$3,008,401	\$3,008,401	\$2,684,415	\$2,675,344	\$2,754,957	\$2,737,050	\$2,704,885	\$2,699,392	\$2,899,327	\$2,836,815	\$2,601,313	\$2,621,384	\$21,909,083
18																	
19	Brown Alternate																
20	Low Usage Residential	6,000	\$656	\$716	\$752	\$712	\$711	\$712	\$712	\$712	\$712	\$712	\$712	\$712	\$711	\$711	\$5,695
21	Moderate Usage Residential	12,000	\$1,375	\$1,495	\$2,009	\$1,918	\$1,793	\$1,910	\$1,973	\$1,966	\$1,959	\$1,942	\$1,943	\$1,912	\$1,846	\$1,854	\$15,451
22	High Usage Residential	18,000	\$2,095	\$2,275	\$3,474	\$3,352	\$2,977	\$3,250	\$3,397	\$3,379	\$3,363	\$3,323	\$3,327	\$3,255	\$3,100	\$3,120	\$26,393
23	Grocery or Restaurant	481,800	\$44,232	\$49,050	\$68,442	\$68,442	\$62,030	\$62,548	\$64,276	\$64,061	\$63,878	\$63,405	\$63,451	\$62,610	\$60,796	\$61,021	\$505,026
24	Elementary School	96,540	\$10,592	\$11,556	\$15,641	\$15,641	\$14,399	\$14,680	\$15,077	\$15,028	\$14,986	\$14,877	\$14,888	\$14,695	\$14,278	\$14,329	\$118,509
25	High School	466,032	\$49,304	\$53,964	\$73,723	\$73,723	\$67,694	\$69,319	\$71,281	\$71,038	\$70,830	\$70,292	\$70,344	\$69,389	\$67,328	\$67,584	\$559,820
26	Industrial Customer	24,090,000	\$1,778,510	\$2,019,410	\$3,008,401	\$3,008,401	\$2,684,415	\$2,700,290	\$2,784,726	\$2,774,253	\$2,765,311	\$2,742,188	\$2,744,425	\$2,703,301	\$2,614,640	\$2,625,635	\$21,829,133
27																	
28	ALJ Allen PD																
29	Low Usage Residential	6,000	\$656	\$716	\$752	\$712	\$711	\$712	\$712	\$712	\$712	\$712	\$713	\$713	\$711	\$711	\$5,697
30	Moderate Usage Residential	12,000	\$1,375	\$1,495	\$2,009	\$1,918	\$1,793	\$1,908	\$1,968	\$1,954	\$1,929	\$1,924	\$2,069	\$2,020	\$1,836	\$1,851	\$15,608
31	High Usage Residential	18,000	\$2,095	\$2,275	\$3,474	\$3,352	\$2,977	\$3,245	\$3,384	\$3,351	\$3,293	\$3,283	\$3,619	\$3,505	\$3,078	\$3,112	\$26,757
32	Grocery or Restaurant	481,800	\$44,232	\$49,050	\$68,442	\$68,442	\$62,030	\$62,497	\$64,123	\$63,739	\$63,054	\$62,937	\$66,886	\$65,546	\$60,529	\$60,933	\$509,311
33	Elementary School	96,540	\$10,592	\$11,556	\$15,641	\$15,641	\$14,399	\$14,669	\$15,042	\$14,954	\$14,797	\$14,770	\$15,677	\$15,369	\$14,216	\$14,309	\$119,494
34	High School	466,032	\$49,304	\$53,964	\$73,723	\$73,723	\$67,694	\$69,264	\$71,108	\$70,671	\$69,893	\$69,760	\$74,247	\$72,724	\$67,024	\$67,484	\$564,691
35	Industrial Customer	24,090,000	\$1,778,510	\$2,019,410	\$3,008,401	\$3,008,401	\$2,684,415	\$2,697,367	\$2,777,271	\$2,758,498	\$2,725,002	\$2,719,285	\$2,912,333	\$2,846,813	\$2,601,573	\$2,621,334	\$22,038,142

Notes:

- Typical customers are based on list agreed to in conference call on 10/8/04; utilities subsequently agreed to add moderate-usage residential customer
- All example residential bills are based on Baseline Territory X [which includes inland portions of Bay Area and is PG&E's largest single baseline zone]
- Bill reductions shown from 2002 to 2003 for residential customers reflect revised baseline quantities that became effective 5/1/2002 [Baseline OIR]
- Bill reductions shown from 2003 to 2004 [for all customers] reflect final Rate Design Settlement Agreement rates that became effective 9/1/2004
- Bills for Elementary and High School example customers are based on standard demand-metered general service schedule and nine-month school year
- Bills for high load factor Grocery or Restaurant customer use voluntary TOU demand-metered rate schedule E-19V and representative TOU load profile
- Bills for example Industrial Customer are based on TOU demand and energy rate schedule E-20P and representative TOU load profile assumptions
- Each DWR Power Charge revenue requirement used for 2005 bill projections is lowered by additional amount of \$200.3 million to reflect current Power Charge Collection Balancing Account (PCCBA) overcollection. The DWR Power Charge revenue requirement is based on PG&E's allocation under one of the following scenarios: a. Interim Allocation Method; b. Peevey Alternate Draft Decision (ADD); c. Brown ADD; d. ALJ Allen ADD.

9. To develop illustrative 2006-2013 bill projections for each generic customer type, PG&E has: (a) held non-generation revenue requirements fixed at their 2005 levels; (b) used multi-year forecast information provided by Steve Roscow as forecast for PG&E's share of each year's DWR power allocations and DWR revenue requirement under the four specified alternatives; and (c) calculated non-DWR generation revenue requirement by multiplying assumed non-DWR URG volumes from Prosym 45 model run by assumed 2005 non-DWR URG power costs (on \$/MWH basis).

PG&E then applies a separately estimated linear model to calculate the 2006-2013 bill projections for each customer type. The model starts with a base bill amount estimated for each customer type for 2005, and then adds to it the incremental change predicted by the linear model, based on the estimated change in the generation revenue requirement for the forecast year relative to the 2005 generation revenue requirement.

10. For purpose of developing assumed non-DWR URG volumes each year [see step 9(c)], PG&E holds the sum of DWR and URG volumes fixed at their 2005 levels. This adjustment is made in order to avoid applying models based on total Gen RRQ (which includes sales growth) to the fixed usage levels associated with each customer type.

11 (General Disclaimer). The non-DWR revenue requirements for 2006 and beyond do not represent a forecast or projection by PG&E and PG&E neither supports nor endorses the numbers. These numbers are intended only to illustrate the relative effects of the various DWR cost allocations.

Southern California Edison Company
 Estimated Bill Impacts under Various DWR Allocation Scenarios
 Total Annual Bill Estimates for Generic Customer Types
 \$/Year

Line	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Subtotal 2005-2012 [no 2013]
Interim Methodology:															
2 Residential - 500 kWh/Month	693	753	774	761	761	770	770	769	768	768	765	763	762	762	6,135
3 Residential - 1,000 kWh/Month	1,457	1,577	2,009	1,744	1,742	1,931	1,938	1,918	1,908	1,904	1,859	1,837	1,836	1,836	15,132
4 Residential - 1,500 kWh/Month	2,222	2,402	3,466	2,772	2,758	3,180	3,194	3,155	3,134	3,124	3,037	2,996	3,007	3,007	24,826
5 Restaurant / Grocery	43,343	48,161	67,314	58,879	56,317	53,751	53,952	53,549	53,443	53,364	52,405	51,215	49,245	49,245	420,923
6 Elementary School	11,953	12,919	16,056	14,344	14,223	15,416	15,452	15,370	15,338	15,320	15,130	14,959	14,752	14,752	121,737
7 High School	57,803	62,454	77,571	69,319	68,556	76,338	76,511	76,113	75,960	75,874	74,957	74,134	73,133	73,133	603,021
8 Industrial Customer	2,066,408	2,307,308	3,364,410	2,703,186	2,659,787	2,693,972	2,704,531	2,684,612	2,680,589	2,676,910	2,628,748	2,560,916	2,439,453	2,439,453	21,069,732
Peevey Alternate:															
11 Residential - 500 kWh/Month	693	753	774	761	761	773	773	771	768	768	757	757	762	762	6,129
12 Residential - 1,000 kWh/Month	1,457	1,577	2,009	1,744	1,742	1,979	1,973	1,946	1,908	1,899	1,744	1,743	1,836	1,836	15,029
13 Residential - 1,500 kWh/Month	2,222	2,402	3,466	2,772	2,758	3,275	3,263	3,210	3,133	3,116	2,808	2,811	3,007	3,007	24,623
14 Restaurant / Grocery	43,343	48,161	67,314	58,879	56,317	54,770	54,698	54,146	53,436	53,272	49,955	49,229	49,245	49,245	418,750
15 Elementary School	11,953	12,919	16,056	14,344	14,223	15,620	15,602	15,489	15,337	15,302	14,639	14,561	14,752	14,752	121,301
16 High School	57,803	62,454	77,571	69,319	68,556	77,321	77,231	76,690	75,954	75,785	72,592	72,217	73,133	73,133	600,923
17 Industrial Customer	2,066,408	2,307,308	3,364,410	2,703,186	2,659,787	2,744,899	2,741,831	2,714,475	2,680,276	2,672,288	2,506,214	2,461,654	2,439,453	2,439,453	20,961,089
Brown Alternate:															
20 Residential - 500 kWh/Month	693	753	774	761	761	770	769	767	766	765	763	763	762	762	6,126
21 Residential - 1,000 kWh/Month	1,457	1,577	2,009	1,744	1,742	1,936	1,923	1,896	1,870	1,864	1,828	1,843	1,836	1,836	14,996
22 Residential - 1,500 kWh/Month	2,222	2,402	3,466	2,772	2,758	3,189	3,164	3,110	3,057	3,047	2,975	3,008	3,007	3,007	24,556
23 Restaurant / Grocery	43,343	48,161	67,314	58,879	56,317	53,851	53,631	53,067	52,621	52,532	51,740	51,339	49,245	49,245	418,026
24 Elementary School	11,953	12,919	16,056	14,344	14,223	15,436	15,388	15,273	15,173	15,153	14,996	14,984	14,752	14,752	121,156
25 High School	57,803	62,454	77,571	69,319	68,556	76,434	76,202	75,648	75,167	75,071	74,315	74,254	73,133	73,133	600,225
26 Industrial Customer	2,066,408	2,307,308	3,364,410	2,703,186	2,659,787	2,698,965	2,688,499	2,660,529	2,639,524	2,635,309	2,595,467	2,567,157	2,439,453	2,439,453	20,924,903
ALJ Allen Proposed Decision:															
29 Residential - 500 kWh/Month	693	753	774	761	761	770	770	768	766	765	756	756	762	762	6,113
30 Residential - 1,000 kWh/Month	1,457	1,577	2,009	1,744	1,742	1,935	1,931	1,906	1,871	1,863	1,721	1,726	1,836	1,836	14,790
31 Residential - 1,500 kWh/Month	2,222	2,402	3,466	2,772	2,758	3,188	3,179	3,131	3,060	3,044	2,762	2,776	3,007	3,007	24,148
32 Restaurant / Grocery	43,343	48,161	67,314	58,879	56,317	53,844	53,795	53,292	52,653	52,507	49,464	48,861	49,245	49,245	413,661
33 Elementary School	11,953	12,919	16,056	14,344	14,223	15,435	15,421	15,318	15,180	15,148	14,541	14,487	14,752	14,752	120,282
34 High School	57,803	62,454	77,571	69,319	68,556	76,428	76,359	75,865	75,198	75,047	72,118	71,861	73,133	73,133	596,010
35 Industrial Customer	2,066,408	2,307,308	3,364,410	2,703,186	2,659,787	2,698,632	2,696,679	2,671,767	2,641,091	2,634,077	2,481,708	2,443,228	2,439,453	2,439,453	20,706,634

Notes:

- Typical customer bills for 2000-2004 reflect; frozen rates in 2000, 1 c/kWh surcharge rates in 2001, full surcharge rates (1 c/kWh and 3 c/kWh) in 2003, and post-PROACT rates in 2004.
- Typical customer bills for 2005 reflect SCE's expected 2003 phase 2 rates adjusted to reflect SCE's 2005 ERRa request.
- DWR scenarios are incorporated in estimated rates based on the applicable DWR revenue requirement adjusted for DA customers' contributions and reflect expected DWR sales.
- Delivery and SCE Generation rates are maintained at 2005 levels for purposes of estimating total customer bills for 2006-2013.
- Allocated DWR revenue and sales for SCE in 2012-2013 are zero.
- The following consolidated revenue requirement changes, discussed in SCE's August 2004 Energy Resources Recovery Account (ERRA) testimony, are included in the 2005 bill impacts:
 - (a) a \$733.689 million increase attributable to SCE's 2005 ERRa forecast phase application (A.04-08-008).
 - (b) a \$47.283 million increase attributable to SCE's 2005 Post Tear General Rate Case Revenue Requirement (D.04-07-022).
 - (c) a \$2.308 million decrease attributable to SCE's 2005 Reduced Capital Recovery Amount (RCRA) (D.94-05-068, Res. E-3389, and D.99-10-057).
 - (d) a \$6.010 million decrease attributable to SCE's demand responsiveness funding (D.01-07-073 and Pub.Util. Code 379.6).
 - (e) a \$13.358 million increase attributable to SCE's low income and energy efficiency funding (A.04-07-012).
 - (f) a \$18.532 million increase attributable to SCE's Catastrophic Event Memorandum Account (Res. E-3824, Advice No. 1801-E).
 - (g) a \$14.879 million increase attributable to SCE's 2005 ERRa reasonableness phase application (A.04-04-005.)

SDG&E Estimated Bill Impacts Under Various DWR Allocation Scenarios
Total Annual Bill Estimates for Generic Customer Types
\$/Year

Line		2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total ('05-'12)	Line
1	Interim Methodology:															1
2	Residential - 500 kWh/Month	638	873	897	883	832	843	845	841	837	837	826	818	785	6,633	2
3	Residential - 1000 kWh/Month	1,337	1,958	2,007	1,919	1,881	1,929	1,943	1,915	1,895	1,892	1,829	1,779	1,578	14,760	3
4	Residential - 1500 kWh/Month	2,035	3,091	3,164	3,079	3,053	3,124	3,150	3,098	3,061	3,055	2,940	2,847	2,478	23,753	4
5	Restaurant / Grocery Store	55,159	61,281	62,697	59,039	58,238	59,750	66,922	66,350	65,951	65,882	64,616	63,602	59,557	512,630	5
6	Elementary School	14,793	16,299	17,150	18,229	18,305	18,689	18,746	18,631	18,551	18,538	18,284	18,082	17,273	146,794	6
7	High School	74,331	81,554	86,408	85,467	84,300	87,847	94,785	94,231	93,845	93,779	92,553	91,573	87,661	736,275	7
8	Industrial Customer	2,631,151	3,039,317	3,113,242	2,925,359	2,860,484	2,932,968	3,291,594	3,262,960	3,243,018	3,239,591	3,176,245	3,125,555	2,923,344	25,195,275	8
9																9
10	Peevey Alternate:															10
11	Residential - 500 kWh/Month	638	873	897	883	832	842	844	842	866	866	840	836	795	6,729	11
12	Residential - 1000 kWh/Month	1,337	1,958	2,007	1,919	1,881	1,921	1,933	1,922	2,070	2,069	1,912	1,886	1,638	15,351	12
13	Residential - 1500 kWh/Month	2,035	3,091	3,164	3,079	3,053	3,108	3,131	3,111	3,382	3,380	3,093	3,044	2,588	24,837	13
14	Restaurant / Grocery Store	55,159	61,281	62,697	59,039	58,238	59,177	66,716	66,494	69,471	69,446	66,298	65,761	60,762	524,124	14
15	Elementary School	14,793	16,299	17,150	18,229	18,305	18,575	18,705	18,660	19,255	19,250	18,621	18,513	17,514	149,093	15
16	High School	74,331	81,554	86,408	85,467	84,300	87,293	94,586	94,370	97,250	97,226	94,180	93,661	88,826	747,392	16
17	Industrial Customer	2,631,151	3,039,317	3,113,242	2,925,359	2,860,484	2,904,321	3,281,291	3,270,157	3,419,014	3,417,760	3,260,348	3,233,509	2,983,565	25,769,964	17
18																18
19	Brown Alternate:															19
20	Residential - 500 kWh/Month	638	873	897	883	832	847	864	859	860	868	863	833	802	6,796	20
21	Residential - 1000 kWh/Month	1,337	1,958	2,007	1,919	1,881	1,954	2,060	2,025	2,035	2,084	2,050	1,870	1,680	15,758	21
22	Residential - 1500 kWh/Month	2,035	3,091	3,164	3,079	3,053	3,169	3,364	3,300	3,318	3,408	3,345	3,015	2,667	25,586	22
23	Restaurant / Grocery Store	55,159	61,281	62,697	59,039	58,238	61,408	69,277	68,566	68,767	69,750	69,065	65,441	61,626	533,900	23
24	Elementary School	14,793	16,299	17,150	18,229	18,305	19,021	19,217	19,075	19,115	19,311	19,174	18,449	17,686	151,048	24
25	High School	74,331	81,554	86,408	85,467	84,300	89,451	97,063	96,375	96,569	97,520	96,857	93,352	89,662	756,848	25
26	Industrial Customer	2,631,151	3,039,317	3,113,242	2,925,359	2,860,484	3,015,891	3,409,334	3,373,785	3,383,814	3,432,953	3,398,709	3,217,516	3,026,766	26,258,769	26
27																27
28	ALJ PD:															28
29	Residential - 500 kWh/Month	638	873	897	883	832	847	863	860	883	882	851	844	795	6,825	29
30	Residential - 1000 kWh/Month	1,337	1,958	2,007	1,919	1,881	1,957	2,052	2,034	2,172	2,169	1,976	1,935	1,639	15,933	30
31	Residential - 1500 kWh/Month	2,035	3,091	3,164	3,079	3,053	3,175	3,348	3,315	3,570	3,564	3,209	3,134	2,591	25,906	31
32	Restaurant / Grocery Store	55,159	61,281	62,697	59,039	58,238	61,620	69,101	68,739	71,527	71,462	67,573	66,747	60,788	537,556	32
33	Elementary School	14,793	16,299	17,150	18,229	18,305	19,063	19,181	19,109	19,667	19,654	18,876	18,711	17,519	151,779	33
34	High School	74,331	81,554	86,408	85,467	84,300	89,656	96,892	96,542	99,238	99,176	95,414	94,615	88,851	760,384	34
35	Industrial Customer	2,631,151	3,039,317	3,113,242	2,925,359	2,860,484	3,026,445	3,400,504	3,382,420	3,521,795	3,518,584	3,324,102	3,282,822	2,984,874	26,441,547	35

Notes:

1 These estimates were only prepared for the limited purpose of helping the Commission allocate DWR's costs, and because of their speculative nature, they should not be relied upon by anyone for any other purpose.

2 Year 2005 includes the following rate changes assumptions:

3 - COS decrease based on SDG&E's COS Settlement, comprised of a \$39.6 million increase to Distribution and a \$53.6 million decrease to Commodity due to SONGS.

4 - Assumes COS Phase II Distribution increase of 3.2%, or \$21.8 million.

5 - Assumes decrease in Distribution revenues due to MICAM of \$16 million.

6 - Includes estimated increase in RMR revenue requirements of \$80 million.

7 - Includes estimated decrease in CTC revenue requirement of \$50 million. AB 265 undercollection is expected to be paid off by the end of '04, but the payoff will not directly impact '05 rates since AB265 undercollections are not being recovered using a separate rate component.

8 - Assumes continuance in 2005 of current credit to AB143X customers, resulting in a decrease of \$68 million. Drops off in 2006.

9 - Assumes continuance in 2005 of current ERRA credit to AB143X bundled service customers, resulting in an increase of \$46 million.

- Drops off in 2006.

10 - Distribution revenue requirement decrease of \$5.3 million resulting from forecast balancing account (RPBA) adjustments.

11 - Distribution revenue requirement increase of \$20.124 million resulting from CEMA Application filed June 28, 2004.

12 - Distribution revenue requirement increase of \$5.9 million resulting from Advice Letter 1623, filed September 21, 2004 (Bark Beetle).

13 - PPP revenue requirement increase of 2%, or \$13.2 million.

14 - FTA revenue requirement reduction of 5%, or \$0.5 million.

15 - Section 376 eliminated, causing a reduction of \$10 million.

16 - Recovery of AB1X shortfalls due to rate caps, that is not currently included in rates, is excluded. Bill calculations do not reflect undercollection in BBA of \$12.92 million as of 9-30-04.

17 - URG costs for '05 of \$301 million, and URG costs for 2006 and beyond are kept at the same rate per kWh as used in 2005.

18 - Total bundled sales are consistent with Prosym 45 in 2005 (adjusted for T&D losses to reflect retail sales), then fixed thereafter.

19 Calculations assume commodity revenues allocated to residential class are recovered from rates applicable to residential usage tiers 3, 4 and 5.

Information on Generic Customer Types:

Approximately 65% of SDG&E's residential customers use 500 kWh/month or less.

Approximately 91% use 1000 kWh/month or less.

Approximately 97% use 1,500 kWh/month or less.

Calculations based on year-end rates for 2000 through 2003, and currently-effective rates for 2004.

"Restaurant / Grocery Store" based on demand of 100 kW and annual usage of 481,800 kWh.

"Elementary School" based on 9-months at 50 kW, 3-months at 25 kW, and annual usage of 96,360 kWh.

"High School" based on 9-months at 280 kW, 3-months at 140 kW, and annual usage of 466,032 kWh.

"Industrial Customer" based on demand of 5,000 kW and annual usage of 24,090,000 kWh.

Industrial bills are calculated at the Primary service level. All other non-residential bills; at the Secondary level.

Residential bills are based on Climate Zone 1.

CERTIFICATE OF SERVICE

I certify that I have by mail, and by electronic mail to the parties to which an electronic mail address has been provided, this day served a true copy of the original attached Assigned Commissioners' Ruling Admitting Late Comparison Exhibit And Requesting Comments on all parties of record in this proceeding or their attorneys of record.

Dated November 18, 2004, at San Francisco, California.

/s/ KRIS KELLER

Kris Keller

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

The Commission's policy is to schedule hearings (meetings, workshops, etc.) in locations that are accessible to people with disabilities. To verify that a particular location is accessible, call: Calendar Clerk (415) 703-1203.

If specialized accommodations for the disabled are needed, e.g., sign language interpreters, those making the arrangements must call the Public Advisor at (415) 703-2074, TTY 1-866-836-7825 or (415) 703-5282 at least three working days in advance of the event.